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NHPUC FEB20'15 AM11:31

By First Class Mail and Electronic Mail

February 18, 2015

Debra Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

Re: DE 15-035 Electric Renewable Portfolio Standard RSA 362-F:4 (V-VI). Adjustments to Renewable Class Requirements.

Dear Ms. Howland,

Innovative Natural Resource Solutions LLC (INRS) respectfully files this objection to the petition of Electricity LLC, d/b/a ENH Power in the above mentioned docket, dated February 11, 2015, in which ENH Power requested that the NH Public Utilities Commission expand this docket to include consideration of Class I, II and IV of the NH Renewable Portfolio Standard.

INRS is a consulting firm whose clients include companies that have an interest in the NH RPS, and in particular the Class I thermal provision.

INRS specifically objects to the expansion of this docket to include any consideration of Class I thermal. The Class I thermal provision was enacted by passage of Senate Bill 218, Chapter 279, Laws of 2012, with an effective date of January 1, 2013. On April 4, 2013, the PUC issued order #25,484 (DE 13-021) delaying implementation of the thermal provision by one year until January 1, 2014. The percentage mandate for Class I thermal was further modified by enactment of House Bill 542, Chapter 279, laws of 2013, which became effective on July 27, 2013. The PUC did not approve a final administrative rule (Puc2500) to implement the thermal provision until December 5, 2014.

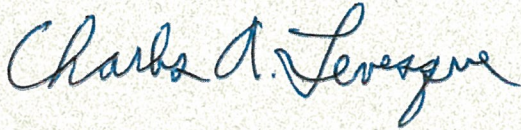
Thus, prospective thermal REC generators have had less than three months to know with absolute certainty what the technical and administrative requirements are for qualification as a PUC-approved REC generator. As of the date of this letter, only three entities have been approved by the PUC for thermal REC generation: Littleton Regional Healthcare, Androscoggin Valley Hospital, and Mascoma Valley Regional School District. To the best of our knowledge, only one entity has fully transacted a transfer of Class I thermal RECs to a retail electric service provider.

However, our firm is aware of at least four other entities that are in the process of submitting application materials, and at least a dozen more prospective thermal REC generators that are expected to apply for qualification in CY2015, including several large projects.

The market for Class I thermal RECs is simply too new and unproven for the PUC to ascertain with any confidence whether or not this component of Class I should be modified by acceleration or delay of the percentage mandate, pursuant to the authority of the PUC under RSA 362-F:4(V).

Therefore, INRS respectfully requests that ENH's petition to expand the scope of DE 15-035 to include consideration of delay of the Class I thermal provision be denied.

Sincerely,

A handwritten signature in blue ink that reads "Charles A. Levesque". The signature is written in a cursive style with a large, sweeping initial "C".

Charles A. Levesque
President

Cc: Service List in DE 15-035 via electronic mail only